IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

Nashville Division

EE ORDER: The motion is **GRANTED**.

L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, et al.,

Plaintiffs

ν.

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General and Reporter, et al.,

Defendants

Alistair E. Newbern
U.S. Magistrate Judge

Civil No. 3:23-cv-00376 Judge Richardson

Judge Newbern

JOINT MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiffs and Defendants hereby jointly move this Court to enter the proposed and agreed upon Protective Order, attached as Exhibit A. In support of this Motion, the Parties state as follows:

- 1. This Court has broad authority to regulate discovery and to enter in protective orders pursuant to Federal Rule of Civil Procedure 26.
- 2. The Parties agree that discovery in this matter will involve the disclosure or production of certain documents, things, and information, by one or more parties, that constitute or contain confidential information, trade secrets, or other priority information within the meaning of Rule 26(c) of the Federal Rules of Civil Procedure, and which should be protected by way of an appropriate protective order.
- 3. The Parties desire to prevent unnecessary dissemination or disclosure of the confidential information.

4. Based upon the foregoing, the Parties agree to abide by the provisions and protections
set forth in the proposed Protective Order attached as Exhibit A.

Dated: May 5, 2023

/s/ Stella Yarbrough

Stella Yarbrough, BPR No. 033637 Lucas Cameron-Vaughn, BPR No. 036284**

Jeff Preptit, BPR No. 038451** ACLU Foundation of Tennessee

P.O. Box 120160
Nashville, TN 37212
Tel.: 615-320-7142
syarbrough@aclu-tn.org
lucas@aclu-tn.org
jpreptit@aclu-tn.org
Attorneys for the Plaintiffs

Joshua A. Block*
Chase Strangio*
American Civil Liberties Union Foundation
125 Broad Street, Floor 18
New York, NY 10004
Tel.: 212-549-2593
jblock@aclu.org
cstrangio@aclu.org
Attorneys for the Plaintiffs

Sruti J. Swaminathan*
Lambda Legal Defense and Education Fund,
Inc.
120 Wall Street, 19th Floor
New York, NY 10005
Tel.: 212-809-8585
sswaminathan@lambdalegal.org
Attorney for the Plaintiffs

Avatara A. Smith-Carrington*
Lambda Legal Defense and Education Fund, Inc.
1776 K Street N.W., 8th Floor
Washington DC 20006
Tel.: 202-804-6245

asmithcarrington@lambdalegal.org Attorney for the Plaintiffs Jointly submitted by:

Tara Borelli*
Lambda Legal Defense and Education Fund,
Inc.

1 West Court Square, Ste. 105 Decatur, GA 30030 Tel.: 404-897-1880

tborelli@lambdalegal.org Attorney for the Plaintiffs

Joseph L. Sorkin*
Dean L. Chapman, Jr.*
Kristen W. Chin*
Richard J. D'Amato*
Theodore J. Salwen*
Akin Gump Strauss Hauer & Feld LLP
One Bryant Park
New York, NY 10036
Tel.: 212-872-1000
jsorkin@akingump.com
dchapman@akingump.com
kristen.chin@akingump.com
rdamato@akingump.com
Attorneys for the Plaintiffs

Elizabeth D. Scott*
Akin Gump Strauss Hauer & Feld LLP
2300 N. Field Street, Suite 1800
Dallas, TX 75201
Tel.: 214-969-2800
edscott@akingump.com
Attorney for the Plaintiffs

Christopher J. Gessner*
David Bethea*
Akin Gump Strauss Hauer & Feld LLP
Robert S. Strauss Tower
2001 K Street N.W.
Washington, DC 20006
Tel.: 202-887-4000
cgessner@akingump.com
dbethea@akingump.com
Attorneys for the Plaintiffs

/s/Steven J. Griffin

Steven J. Griffin, BPR. No. 40708
Clark L. Hildabrand, BPR No. 38199
Trenton Meriwether, BPR No. 38577
Ryan N. Henry, BPR No. 40028
Brooke A. Huppenthal, BPR No. 40276
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, Tennessee 3720
(615) 741-959
steven.griffin@ag.tn.gov
clark.hildabrand@ag.tn.gov
trenton.meriwether@ag.tn.gov
trenton.meriwether@ag.tn.gov
brooke.huppenthal@ag.tn.gov

Adam K. Mortara, BPR No. 40089** Lawfair LLC 40 Burton Hills Blvd., Suite 200 Nashville, TN 37215 (773) 750-7154 mortara@lawfairllc.com

Cameron T. Norris, BPR No. 33467 Consovoy McCarthy PLLC 1600 Wilson Blvd., Suite 700 Arlington, VA 22209 (703) 243-9423 cam@consovoymccarthy.com Attorneys for Defendants

^{*}admitted pro hac vice

^{**}application for admission pending

CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2023, the undersigned filed the foregoing Joint Motion for Protective Order via this Court's electronic filing system, which sent notice of such filing to the following counsel of record:

Steven J. Griffin Clark L. Hildabrand Trenton Meriwether Ryan N. Henry Brooke A. Huppenthal Office of the Tennessee Attorney General P.O. Box 20207 Nashville, Tennessee 3720 (615) 741-959 steven.griffin@ag.tn.gov clark.hildabrand@ag.tn.gov trenton.meriwether@ag.tn.gov ryan.henry@ag.tn.gov brooke.huppenthal@ag.tn.gov	Tamica Daniel United States Department of Justice Housing and Civil Enforcement Section 950 Pennsylvania Avenue NW 4CON Washington, DC 20530 (202) 598-9636 Tamica.Daniel@usdoj.gov
Adam K. Mortara Lawfair LLC 40 Burton Hills Blvd., Suite 200 Nashville, TN 37215 (773) 750-7154 mortara@lawfairllc.com	Alyssa C. Lareau Coty Montag Gloria Yi United States Department of Justice Federal Coordination and Compliance Section 950 Pennsylvania Avenue NW 4CON Washington, DC 20530 (202) 305-2994 Alyssa.Lareau@usdoj.gov Coty.Montag@usdoj.gov Gloria.Yi@usdoj.gov

Cameron T. Norris (BPR# 33467) Consovoy McCarthy PLLC 1600 Wilson Blvd., Suite 700 Arlington, VA 22209 (703) 243-9423 cam@consovoymccarthy.com Ellen Bowden McIntyre
U.S. Attorney's Office (Nashville)
719 Church Street
Suite 3300
Nashville, TN 37203
(615) 736-2125
(615) 401-6626 (fax)
ellen.bowden2@usdoj.gov

/s/ Stella Yarbrough

syarbrough@aclu-tn.org

Stella Yarbrough, BPR No. 033637 ACLU Foundation of Tennessee P.O. Box 120160 Nashville, TN 37212 Tel.: 615-320-7142